

FILED
At Albuquerque NM

APR 14 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELIJAH SHIRLEY,
MAYNARD SHIRLEY, and
MICHAEL SHIRLEY,

Defendants.

CRIMINAL NO. 15-1285JB

Count 1: 18 U.S.C. §§ 1153, and 1111;

First Degree Murder; 18 U.S.C. § 2: Aiding
and Abetting;

Count 2: 18 U.S.C. §§ 1153, and 113(a)(6):
Assault Resulting in Serious Bodily Injury;
18 U.S.C. § 2: Aiding and Abetting;

Count 3: 18 U.S.C. §§ 1153, and 113(a)(3):
Assault With a Dangerous Weapon;
18 U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did unlawfully kill John Doe 1, with malice aforethought, in that they killed John Doe 1 willfully, deliberately, maliciously, and with premeditation by stabbing him with a knife.

In violation of 18 U.S.C. §§ 1153, 1111, and 18 U.S.C. § 2.

Count 2

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did knowingly and unlawfully assault John Doe 2, such assault resulting in serious bodily injury.

In violation of 18 U.S.C. §§ 1153, 113(a)(6), and 18 U.S.C. § 2.

Count 3

On or about March 21, 2015, in Indian Country, in San Juan County, in the District of New Mexico, the defendants, **ELIJAH SHIRLEY**, an Indian, **MAYNARD SHIRLEY**, an Indian, and **MICHAEL SHIRLEY**, an Indian, did knowingly and unlawfully assault John Doe 2, with a dangerous weapon, a knife, with intent to do bodily harm.

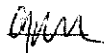
In violation of 18 U.S.C. §§ 1153, 113(a)(3), and 18 U.S.C. § 2.



Assistant United States Attorney

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

 04/10/15 1:47PM